

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 4:19cv-11093-TSH

PAUL JONES,

Plaintiff

v.

MONTACHUSETT REGIONAL TRANSIT
AUTHORITY, et al.,

Defendants

DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

Defendants, Montachusett Regional Transit Authority (“MART”), and Rebecca Badgley, Donna Landry, Bonnie Mahoney, Karen Cordio, Joanne Norris, Stephanie Richards, Tamara Shumovskaya, Jessica Torres, Amanda Kukta, Robert Monk, Michelle Moyo, Ivan Roman, and Crystal Geisert (collectively “Individual Defendants”) (when inclusive of MART, collectively “Defendants”) hereby file this motion for summary judgment on the limited issue of whether Plaintiff, Paul Jones (“Plaintiff” or “Jones”) was an employee of MART or an independent contractor pursuant to the Court’s Order dated April 28, 2021. Because the undisputed material facts show that MART is not Plaintiff’s employer, Defendants seeks judgment in their favor on all of the remaining claims contained in Plaintiff’s Second Amended Complaint.

In further support of this Motion, Defendants rely upon the memorandum of law filed herewith.

DEFENDANTS,

MONTACHUSETT REGIONAL TRANSIT
AUTHORITY, REBECCA BADGLEY, DONNA
LANDRY, BONNIE MAHONEY, KAREN
CORDIO, JOANNE NORRIS, STEPHANIE
RICHARDS, TAMARA SHUMOVSKAYA,
JESSICA TORRES, AMANDA KUKTA,
ROBERT MONK, MICHELLE MOYO, IVAN
ROMAN, and CRYSTAL GEISERT

By their attorneys,

/s/ Deborah I. Ecker

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Dated: July 29, 2021
773834/MART/0006

CERTIFICATE OF SERVICE

I, Deborah I. Ecker certify that the above document will be served by first-class mail upon any party or counsel of record who is not a registered participant of the Court's ECF system, upon notification by the Court of those individuals who will not be served electronically.

Date: July 29, 2021

/s/ Deborah I. Ecker